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April 5, 1993

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Ms. Donna R. Searcy  
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Federal Communications Commission  
Suite 222  
1919 M Street, N.W.  
Washington, D.C. 20554

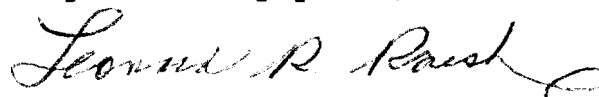
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

Attached hereto are the original and seven copies of the  
Comments of Harris Corporation-Harris Allied Broadcast Division  
in response to the Commission's Notice of Proposed Rulemaking in  
ET Docket No. 92-298.

If there are any questions, please do not hesitate to call  
Mr. Edward Hummers or me at (703) 812-0480.

Very sincerely yours,



Leonard R. Raish

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Enclosures

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BEFORE THE

## Federal Communications Commission

APR 25 1993

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
 Amendment of the Commission's ) ET Docket No. 92-298  
 Rules to Establish a Single AM )  
 Radio Stereophonic Transmitting )  
 Equipment Standard )

To: The Commission

COMMENTS BY  
HARRIS CORPORATION--HARRIS ALLIED BROADCAST DIVISION

The Harris Corporation -- Harris Allied Broadcast Division ("Harris"), through its attorneys, submits the comments below with regard to the above cited Notice that proposes adoption of a standard for stereophonic AM broadcast radio service, specifically, the Motorola C-Quam system. In the comments below Harris supports the Commission's proposal.

I. BACKGROUND

1. The Harris Corporation has its corporate headquarters in Melbourne, Florida. The Harris Allied Broadcast Division headquarters is located in Quincy, Illinois. Harris is one of the world's leading producers of high technology broadcasting equipment. Its products include a full line of AM, FM, and shortwave radio transmitters, UHF and VHF television transmitters, antennas, studio equipment, and related remote control systems. Harris, therefore, is interested in this proposed rulemaking and welcomes this opportunity to comment. Harris was an early proponent and developer of AM Stereo systems as indicated in the Notice at para. 3.

**II. A SINGLE STANDARD FOR AM STEREO  
WOULD BE IN THE NATIONAL INTEREST**

2. In the Notice (at para. 5) the Commission states "We believe the public interest would best be served by adopting the Motorola C-Quam system as the U.S. AM stereo standard." AM stereo has a long history of interest to broadcasters, the listening public, and broadcast equipment manufacturers. Harris concurs that it is in the U.S. national interest to encourage the spread of AM stereo through the adaption of a single transmission mode. Several years ago Harris dropped its proposed stereo system and, being a proponent for AM stereo service, has supported since then the Motorola C-Quam system. The intent of Harris has been and continues to be to encourage the use of a stereo system that is mono compatible and provides the quality necessary to attract the listening public.

**III. HARRIS HAS ENCOURAGED OWNERS OF  
THE HARRIS AM STEREO SYSTEM TO  
CONVERT TO MOTOROLA C-QUAM**

3. For some time Harris has encouraged owners of the Harris AM stereo system to convert to Motorola C-Quam. Further Harris has provided instructions on how to make the conversion noting the Motorola C-Quam system exhibits some compatibility already with the Harris AM stereo system. There is no problem of seeking type notification for the converted Harris equipment as the conversion would be within the parameters of the original type notification. Further, in response to Footnote 7 of the Notice, Harris does not recommend permitting stations currently using the Harris system to continue to do so indefinitely. Instead Harris is convinced that total conversion of all existing stereo radio stations to the

Motorola C-Quam system is in the overall best interests of broadcasting. Harris's own experience and testing over many years with the Motorola C-Quam system confirms this.

4. Selection of an alternative to the Motorola C-Quam would not be in the best interest of either the public or the broadcasters. Harris concurs with the Commission's belief set forth in the Notice (at para. 6) that selection of an "alternative system to the Motorola system would set back the clock on the implementation of an AM stereo service, to the substantial detriment of the public and broadcasters."

#### IV. CONCLUSION

5. Noting the foregoing, Harris urges the Commission to adopt the proposed rules which incorporate the Motorola C-Quam standard in Part 73 of its rules.\*

Respectfully submitted,

HARRIS CORPORATION--HARRIS  
ALLIED BROADCAST DIVISION

By Leonard R. Raish  
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Its Attorneys

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Dated: April 5, 1993

**\*Harris suggests the term "type accepted" in Appendix B, para. 2(a) should read "type notified".**